



Food and Drug Administration Rockville MD 20857

FEB 23 1989

DAF 3803

Conrad Kempton Technical and Regulatory Affairs Keppers Company Inc. Wolman Department 436 Seventh Avenue Pittsburgh, Pennsylvania 15219

Dear Mr. Kempton:

We refer to your submissions dated October 25, 1984, and December 29, 1987, requesting approval for use of Kopper's "WOLMANIZED" pressure treated wood containing chromated copper arsenate. The chromated complex is used to prevent insect damage and wood decay. The pressure treated wood is to be used in the construction of silage and feed bunkers, as well as, water troughs for food producing animals.

We have completed our assessment of the leaching study with respect to watering troughs and find that over the course of the study levels of arsenic do not exceed the levels established by the Environmental Protection Agency (EPA) for drinking water, 0.01 to 0.05 ppm, and is below the 0.2 ppm upper limit recommended by the National Academy of Sciences (NAS) for domestic animal drinking water. We have no concerns about the leaching of arsenic to silage, grains or feeds.

Accordingly, we do not object to the marketing of "WOLMANIZED" wood for the above purposes. We reserve the authority to withdraw this letter at any time should data become available indicating levels of arsenic are in excess of the above guidelines, or raises questions about the safe use of your product. If we can be of further help please call Dr. Woodrow M. Knight on 301-443-3390.

Sincerely,

George Graber, Ph.D.

Director

Division of Animal Feeds

Center for Veterinary Medicine